

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of	:	
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Provision of Directory Listing Information Under the Communications Act of 1934, As Amended	:	CC Docket No. 99-273
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	:	
The Use of N11 Codes and Other Abbreviated Dialing Arrangements	:	CC Docket No. 92-105
	:	
	:	
Administration of the North American Numbering Plan	:	CC Docket No. 92-237
	:	

**COMMENTS OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE**

1. INTRODUCTION

On January 9, 2002, the Federal Communications Commission (“FCC” or “Commission”) released a Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceedings seeking comments on whether changes in the provision of directory assistance (“DA”) services by Local Exchange Carriers (“LECs”) through 411 codes are needed and in the public interest to promote competition in the market for retail directory assistance services. In particular, the Commission seeks comments on the merits, costs, and implementation concerns related to the proposal of Telegate, Inc. that customers be required to presubscribe to 411¹ for DA service. The

¹ The PA OCA will generally refer to 411 as a dialing code for DA service that would be subject to presubscription. The PA OCA also recognizes that there may be other dialing codes, such as 555-1212 that could be subject to presubscription as well.

Pennsylvania Office of Consumer Advocate (“PA OCA”) uses the 411 code as an abbreviation for all such codes. Further, the Commission recognizes that possible alternatives exist and seeks comments on the merits of those alternatives.

The PA OCA is designated by Pennsylvania law to represent utility consumers before the Pennsylvania Public Utility Commission (“PA PUC”), federal agencies, and state and federal courts. The PA OCA is actively involved in representing consumer interests in telecommunications issues in these venues and is, therefore, familiar with the issues contained in this NPRM.

The PA OCA submits, *inter alia*, that the FCC should not move to require 411 presubscription through federal regulation in all cases. Regulation of local DA service differs widely among the states. The broad presubscription of 411 service in all cases would conflict with the regulated rates established by state commissions under their ratemaking authority.

In Pennsylvania, local DA is treated as a non-competitive service for most ILECs with rates structured to include an allowance for a specific number of free calls to DA, followed by a per call charge. Special rates and rules apply to calls originating from hospitals or nursing homes or for callers who are sight-impaired.

In other instances, states have deregulated local DA service. On some occasions this happened after accepting offers by the incumbent to continue provision of discounted or no charge local DA service for special needs classes of customers.² For the reasons set forth below, the PA

² See, e.g., In re: U S West Communications, Inc., n/k/a Qwest Corporation, Docket Nos. INU-00-3, WRU-99-8-272, WRU-00-88-272, Order Deregulating Local Directory Assistance, (Iowa Dept. of Commerce Utilities Brd., Feb. 23, 2001), application for rehearing and stay denied (Apr. 13, 2001).

See also the discussion below of the deregulation of DA service as provided by United

OCA respectfully submits that the fact that local DA service is becoming more of a portal to enhanced DA (“EDA”) services should not allow the Commission to overlook the public service aspects of local DA service as regulated by the states. If the FCC determines that presubscription to 411 is in the public interest, then the PA OCA advocates that the FCC should impose this requirement on LECs, but only when the provision of local DA service has been deemed competitive by state regulators and is no longer price regulated.

II. SUMMARY

The PA OCA agrees generally with the propositions that competition is beneficial to the consuming public and that diversity of services is likewise desirable. Where directory service is no longer regulated by state commissions, it would be appropriate for the consumer to be connected to the best 411 service provider whenever the 411 dialing code is dialed by that consumer. The PA OCA understands that this could happen through a presubscription process.

In evaluating whether to require competitive 411 presubscription, or other changes in numbering arrangements, the PA OCA submits that the FCC must consider the regulation by states of local DA service by LECs. Local DA is intrastate in nature and is often subject to regulation by state commissions as to price and the reasonableness of service. Only if the state regulatory authority has deemed local DA service to be subject to competition and deregulated, would it be appropriate to require 411 competitive presubscription.

The PA OCA submits that it is within the FCC's discretion under the Telecom Act to take this measured approach to implementing changes in numbering arrangements related to access to DA services. In the NPRM, the FCC questions what provisions of the Telecommunications Act of 1996 (Telecom Act) should guide the FCC's decision. The PA OCA respectfully submits that the dialing parity provisions of section 251 do not control. The imposition of 411 presubscription is not mandated by the dialing parity provisions. Rather, at issue is whether and how the FCC should exercise its plenary authority over numbering issues to best fulfill the multiple policy goals of the Telecom Act.

The PA OCA notes that the Commission has already exercised its numbering authority over abbreviated dialing codes in the context of implementing the requirements of Section 225 of the Telecom Act³ concerning telephone relay service.⁴ Many of the lessons and judgments made by the FCC in the TRS Second Report should be followed in this proceeding, as addressed below. In particular, the FCC should not lose sight of the overall public interest in how local DA service is priced and provided in reviewing the technical feasibility and economics of Telegate's proposal.⁵

³ 47 U.S.C. § 225(b)(1).

⁴ Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, Second Report and Order, 15 FCC Rcd. 15188 (2000) ("TRS Second Report").

⁵ *Id.* at 15214, ¶55.

III. COMMENTS

- A. The Public Interest is Best Served By Not Requiring Competitive Presubscription for the Use of the 411 Access Code Where States Regulate the Price of Local DA Service.

1. Introduction

In the NPRM, the FCC recognized that local DA service is regulated in some states as to “quality of service, speed-of-answer, price, number of free DA calls per month, or in the case of people with disabilities, free DA service.”⁶ Accordingly, the FCC requests comments from state commissions and other parties on whether and how such public policy regulation might continue to be implemented and whether such requirements would only apply to ILECs or “providers with more than a *de minimis* share of the DA market.”⁷

In response, the PA OCA submits that where local DA service is still subject to state price regulation the FCC should not attempt to switch the DA service provider that is accessible through the commonly dialed 411 code. Moreover, it would be fundamentally unfair where local DA service continues to be regulated and where consumers frequently use 411 to access that service from their LEC, to change the DA service provider reached through that dialing code.

⁶ NPRM at ¶ 55.

⁷ *Id.*

At its most basic, a subscriber calling local DA is seeking the number for another subscriber in the same LATA.⁸ The prices and terms set for local DA service, as provided by LECs subject to the jurisdiction of state commissions, represents the judgment and policies of the state authority. As explained below, there may be mechanisms in place in many states where some intrastate telecommunications service is ruled competitive and is deregulated as to price. However, the PA OCA recommends that the FCC not exercise its numbering authority so as to disturb the state regulatory scheme where local DA service remains regulated.

2. The PA OCA Agrees that 411 Competitive Presubscription Is Appropriate Where DA Service Is No Longer Price Regulated.

As noted above, 411 competitive presubscription is not appropriate where state regulatory authorities continue to regulate the price charged for local DA service. However, where the state commission has decided that such services are no longer subject to state regulatory authority, in effect deeming those services to be competitive, then it would be entirely appropriate for the use of the 411 code to access local DA services to be subject to competitive presubscription as well.

The PA OCA recognizes that LECs should not be given an advantage through the use of the 411 dialing code where that service is ostensibly subject to competition. The PA OCA recognizes that in a competitive process the use of the 411 code to access DA services is an advantage. This advantage should not be conferred simply because the LEC using that dialing code

⁸ See Provision of Directory Listing Information under the Telecommunications Act of 1934, as Amended, CC Docket No. 99-273, First Report and Order, 16 FCC Rcd. 2736, 2738, n. 8 (2001) (“Directory Listing First Report and Order”)(Local directory assistance “requests a telephone number of a subscriber located within his or her local access and transport area (LATA)...”).

has been offering those services for an extended period of time, *i.e.* the LEC has a legacy advantage.

Where those services are now found to be competitive and no longer subject to state price regulation it would be entirely appropriate to offer the use of that access code through a competitive process.

3. Pennsylvania's Regulation of Local Directory Assistance Service Illustrates How PA OCA's Recommendation Could Apply.

As explained above, it is PA OCA's position that the Commission should not consider requiring 411 prescription unless and until a state has determined that the provision of local DA service is competitive either as to a specific LEC or statewide. In Pennsylvania, most ILEC tariffs provide that local DA service includes an allowance for one or two free calls per month after which a per call charge is applied. Additionally, all or most Pennsylvania LECs provide an exemption from charges for local DA service where a call to local DA is from patients in hospitals or skilled nursing homes, or from residences where the caller is unable to use a directory because of a visual or physical handicap. Certification requirements apply to qualify the nursing home, hospital or residential customer to qualify for the exemption. The PA OCA submits that the price and terms for local DA service reflect both the costs of providing the service and the state's determination that for some local exchange customers the published white page directory is not a useful alternative to for-a-fee directory assistance lookup.

Of the Pennsylvania ILECs, the PA OCA understands that only United Telephone Company of Pennsylvania, Inc. ("United") has asked for and received PA PUC approval to treat local DA service as a competitive service, subject to the filing of only an informational tariff. Accordingly, the PA PUC will no longer have price regulatory authority over United's local DA service. Even so, the United tariff reflects the gradual phase-out of the free call allowance for

residential callers so that effective 4/3/03 the permitted allowance will be zero.⁹ Additionally, the United tariff continues to provide an exemption from charges for local DA service where made by patients in hospitals or skilled nursing homes, or from residences where the caller is unable to use a directory because of a visual or physical handicap.¹⁰ The PUC has not been asked to classify the provision of local DA service by other ILECs in Pennsylvania as competitive pursuant to state law.¹¹ It is the position of the PA OCA that the United 411 service should now be subject to competitive presubscription.

B. In Ruling on the Telegate Proposal and NPRM, the FCC Should Act Under its Authority Over Numbering Issues Pursuant to Section 251(e).

1. Introduction

In the NPRM, the FCC seeks comment on what provisions of the Telecom Act require or provide the FCC with the authority to act on Telegate's 411 presubscription proposal.¹² Specifically, the FCC questions whether section 251(b)(3)¹³ imposes a duty on LECs to provide

⁹ See The United Telephone Company of Pennsylvania, Tariff Telephone - Pa. P.U.C. No. 26, Section 200, Original Sheet 1, effective April 12, 2001.

¹⁰ *Id.*

¹¹ Section 3005 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 3005, permits LECs subject to an alternative form of regulation to request the PA PUC to classify services as competitive.

¹² NPRM at ¶¶ 7-11.

¹³ 47 U.S.C. § 251(b)(3). Section 251(b)(3) states that all local exchange carriers have "[t]he duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service, and the duty to permit all such providers to have non-discriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays." *Id.*

dialing parity in the form of access to the 411 code to all competing providers of telephone exchange service and telephone toll service.¹⁴ Alternatively, the FCC questions whether its authority over numbering matters pursuant to Section 251(e)¹⁵ provides it with the authority to require presubscription to 411 to access DA services.¹⁶

The PA OCA submits that the FCC should review Telegate's 411 presubscription proposal as a request of the FCC to exercise its plenary authority over numbering issues. As explained below, the requirements of section 251(b)(3) cannot logically be stretched so as to require 411 presubscription for the purpose of promoting competition for all DA services.

2. Section 251(b)(3) of the Telecom Act Does Not Generally Require the FCC to Approve Telegate, Inc.'s 411 Presubscription Proposal.

¹⁴ NPRM at ¶¶ 7-10.

¹⁵ 47 U.S.C. § 251(e).

¹⁶ NPRM at ¶ 11.

The FCC has previously determined that section 251(b)(3) only requires all LECs to provide non-discriminatory access to local DA databases, not any and all databases which the LEC may use.¹⁷ In support, the FCC noted that incumbent LECs' (ILECs') processing of service orders provide the ILECs with the "near total control over the vast majority of local directory listings that form a necessary input to the competitive provision of directory assistance."¹⁸ In contrast, ILECs do not exercise control over such a bottleneck element with regard to non-local DA listings.¹⁹

¹⁷ NPRM at ¶¶ 7-8.

¹⁸ Directory Listing First Report and Order, 16 FCC Rcd. at 2738-2739, ¶ 3.

¹⁹ In Directory Listing First Report and Order, the FCC observed that DA may be divided into two types – local and non-local, based on whether the customer "requests a telephone number of a subscriber located within his or her local access and transport area (LATA)..." or outside of the subscriber's home LATA or area code. Directory Listing First Report and Order, 16 FCC Rcd. at 2738, n.8.

In this NPRM, the FCC asks parties to comment on whether section 251(b)(3) also imposes a duty on LECs to provide dialing parity in the form of access to the 411 code to all competing providers of telephone exchange service and telephone toll service.²⁰ In reply, the PA OCA submits that the dialing parity requirements of section 251(b)(3) does not impose such a duty for several reasons.

Dialing parity as defined at section 153(15) concerns the provision of “telecommunications services in such a manner that customers have the ability to route automatically, *without the use of any access code*, their telecommunications to the telecommunications services of the customer’s designation....”²¹ No commenting party, including Telegate, has suggested that a subscriber should be able to pick up the telephone and automatically, without the dialing of any access code, contact a DA provider. Rather, the issue in this proceeding is whether the FCC should implement some change to the current arrangements for access to DA whereby the caller dials some access code, whether 411, 555-1212, or some other number, used to access DA services. In this way, the PA OCA submits that access to DA service is fundamentally different from intraLATA toll calls which may be routed to the carrier of choice without the use of any access code.

²⁰ *Id.*

²¹ 47 U.S.C. § 153(15) (emphasis added).

Further, as the FCC noted in the NPRM, the FCC has previously recognized that not all DA providers may fit in the category of “competing providers of telephone exchange service and telephone toll service” who are eligible to receive dialing parity under section 251(b)(3).²² Indeed, in the Directory Listing First Report and Order, the FCC found that only to the extent that a DA provider actually completed the call through provision of the additional Directory Assistance Call Completion (“DACC”) service, if offered and accepted by the subscriber, would the DA provider fit within the category of intended beneficiaries of the dialing parity rule.²³ Given that Telegate appears to propose that subscribers should be able to presubscribe to any and all providers of DA service, without requiring that each call be concluded with DACC service, PA OCA submits that section 251(b)(3) does not appear to apply.

The later part of section 251(b)(3) identifies the services or functions all LECs are required to offer on a non-discriminatory basis, including “access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays.”²⁴ PA OCA submits that the LECs which control or dominate the compilation of local directories make the contents available to competitors. As to the “access to telephone numbers ... with no unreasonable

²² NPRM at ¶¶ 7-8.

²³ Directory Listing First Report and Order, 16 FCC Rcd. at 2744-2747. (¶¶ 15-25). In that order, the FCC also noted that the “competing providers of telephone exchange service and telephone toll service” language likely meant that such providers would be subject to state regulation such as certification requirements, qualifications which not all competitive DA providers may have bothered to secure. *Id.* at 2747, n.69. The FCC suggested that such DA providers who desired non-discriminatory access to the directory listings of ILECs remedy that deficiency “expeditiously.” *Id.*

²⁴ 47 U.S.C. § 251(b)(3).

dialing delays,” PA OCA submits that this language does not require the FCC to force the opening of the 411 code to local DA providers other than the LEC that the consumer has chosen for local service.

In summary, the PA OCA submits that section 251(b)(3) does not require the FCC to implement 411 presubscription. Presubscription to 411 may be compatible with the policy goals of section 251, but the PA OCA submits that the FCC should give meaning to the express intent of Congress to limit what is meant by “dialing parity” and the group to whom LECs must offer dialing parity. Telegate’s proposal that providers of DA services, ranging from what the FCC has called “the basic number-lookup function,”²⁵ to concierge services through EDA,²⁶ should be allowed to offer their services on a presubscribed basis through 411 is broader in scope than the interests addressed by Section 251(b)(3).

3. The FCC, Not LECs, Control Access to Specific Telephone Numbers or Access Codes, Pursuant to the FCC’s Numbering Authority.

²⁵ Directory Listing First Report and Order, 16 FCC Rcd. at 2745, ¶ 18.

²⁶ As used in this NPRM, the FCC has explained that enhanced DA services “are DA services that offer additional features such as a multiple listing from a single call or concierge service.” NPRM at ¶ 21, n.79.

In the NPRM, the FCC suggests that its plenary numbering authority pursuant to section 251(e) may provide an alternate source of authority for the FCC to address competition in the retail DA market.²⁷ The PA OCA agrees that the FCC's authority over numbering arrangements is plenary under the Act and so provides a more appropriate source of authority for any action the FCC may take regarding Telegate's 411 presubscription proposal. In reviewing the changes in numbering proposed by Telegate and other providers, the PA OCA submits that the FCC should be guided by section 251(e)(1)'s requirement that the assignment of numbers is to be administered by a neutral third party which will make "such numbers available *on an equitable basis*."²⁸ The PA OCA submits that the Commission's authority over numbering arrangements as provided by section 251(e)(1) provides it with more discretion in determining how best to allocate scarce numbering resources, including N11 codes. Thus it is not LECs who have had the use of 411 codes who control access to those numbers, rather it is the FCC in the exercise of its numbering authority.²⁹

While the FCC may assign numbers on an equitable basis to promote competition in the local DA market, the PA OCA submits that competitive presubscription to 411 is not required by the Telecom Act. Indeed, the Telecom Act provides two examples where Congress expressly required the Commission to act to implement nationwide calling to serve a public purpose. Section 251(e)(3) directs the FCC to designate "9-1-1" as the "universal telephone number within the

²⁷ NPRM at ¶ 11.

²⁸ 47 U.S.C. § 251(e)(1) (Numbering administration, Commission authority and jurisdiction) (emphasis added).

²⁹ 47 U.S.C. § 251(b)(3).

United States for reporting an emergency to appropriate authorities and requesting assistance.”³⁰

Second, section 225 charges the Commission with ensuring “that interstate and intrastate telecommunications relay services are available, to the extent possible and in the most efficient manner, to hearing-impaired and speech-impaired individuals in the United States.”³¹

The PA OCA submits that to the extent that the FCC acts on the merits of Telegate’s 411 presubscription proposal or alternatives proposed, such as offering uniform calling codes for the use of DA providers, section 251(e) should be viewed as the source of the FCC’s discretion to act.

4. The FCC Should Follow and Apply Lessons Already Learned in the TRS Second Report and Order Regarding Allocation of N11 Numbers.

³⁰ 47 U.S.C. § 251(e)(3).

³¹ 47 U.S.C. § 225(b)(1).

The PA OCA submits that in exercising its discretion over numbering matters, the FCC should proceed consistent with the FCC's August 9, 2000 Second Report and Order regarding telephone service relay matters.³² Significantly, in the TRS Second Report, the FCC found that, even though implementation of 711 as the nationwide access number for TRS would provide valuable benefits to the hearing impaired, the Commission still encouraged "the continuation of alternate, direct access numbers to reach particular types of relay services" as of benefit to frequent users of specific services.³³ The PA OCA submits that the FCC should continue to recognize that access codes other than 411 may provide different or complementary benefits to an abbreviated dialing arrangement.³⁴ Indeed, in the TRS Second Report, the FCC confirmed that while TRS users are required to use the TRS provider selected by the state for intrastate TRS, that "callers may make interstate calls through their state's provider or choose another TRS provider by dialing national toll-free numbers."³⁵

The FCC recognized that TRS choice at the interstate level reflected the FCC's position that "competitive forces are generally the preferred way to improve service quality and bring new services to customers."³⁶ However, the FCC did not preempt state regulatory

³² TSR Second Report, 15 FCC Rcd. at 15202, ¶28.

³³ *Id.*

³⁴ *Id.* at 15190-15191, ¶ 3.

³⁵ *Id.* at 15212, ¶ 51.

³⁶ *Id.*

determinations concerning the use of 711 and allowed states to prescribe a 711 carrier for a regulated service.

The PA OCA submits that in the case of addressing access to local DA service, the Telecom Act does not expressly direct the FCC to regulate intrastate access to local DA service, in contrast to the delegation of authority pursuant to section 225. Further, the FCC has recognized the benefits of allowing market forces to work to further competition. Finally, the PA OCA submits that the guidelines stated by the FCC for consideration of whether to require presubscription to 711 access to TRS in the future should likewise apply in this proceeding. Specifically, the FCC should balance its review of Telegate's 411 presubscription proposal with consideration of whether it is "technically feasible, economically viable, and in the public interest."³⁷

- C. Once Local DA Service is Competitive, if the FCC Implements Numbering Changes to Promote Competition for DA Services, the FCC Should Assure that Consumers Can Make Informed Choices and Have Flexibility in Choosing a DA Provider.

- 1. Introduction

³⁷ *Id.* at 15214, ¶ 55.

In the NPRM, the FCC seeks comments on how presubscription to 411 might be implemented.³⁸ Telegate's preferred method is for the FCC to require all retail customers of telecommunications services to presubscribe to the DA provider of their choice to be accessed through 411.³⁹ Alternatively, commenters have suggested that the FCC set aside a range of uniform codes, all equally abbreviated and identifiable with the provision of DA service, through which consumers may select a particular DA provider each time they make a call to DA.⁴⁰ The FCC requests comments on whether and how the alternative proposals might be technically feasible.⁴¹ The FCC also asks for comments on the size and characteristics of the current market for DA services, local, national, and enhanced DA.⁴²

The PA OCA is not in a position to comment on how or what modifications might be required to be made to the public switched network to implement 411 presubscription or alternatives proposed. Nor is the PA OCA prepared to critique the estimates of other commenters as to the size and potential for growth in the DA market. What the PA OCA does submit is that the Commission should carefully assess the information provided through comments on these issues with an eye toward providing consumers with the best access to a

³⁸ NPRM at ¶¶ 2, 34, 38-40.

³⁹ NPRM at ¶¶ 4-5, 15.

⁴⁰ NPRM at ¶¶ 44-53.

⁴¹ NPRM at ¶¶ 22, 27-29.

⁴² NPRM at ¶¶ 17-21.

variety of DA services and providers with minimal transition costs and customer confusion. The PA OCA generally supports the opportunity for consumers to presubscribe to 411 and similar dialing codes for DA service when that service is found to be competitive by the state.

2. IntraLATA Presubscription Provides a Rough Model for Implementation of Competitive 411 Presubscription.

In the NPRM, the FCC notes that for intraLATA toll, the “Commission adopted a basic presubscription method called 2-PIC and left the specifics of presubscription administration to the states.”⁴³ Under this arrangement, customers would be offered a choice of presubscribing to the current ILEC or another provider. The customer would have to affirmatively choose another carrier, or in the absence of any action, the customer would stay with the original provider. The PA OCA submits that this presubscription method may be appropriate for 411 presubscription.

Specifically, the PA OCA agrees that states should have a role in the administration of the presubscription process which would replace ILECs dominant use of 411 to provide local DA. Further, PA OCA agrees that the presubscription process should not force customers to migrate to another service provider. This principle is particularly important in the case of DA services where some providers may have no name recognition or reputation known to customers. This may be because the competitive DA provider may not have established another service relationship with the customer, in contrast to interexchange carriers whose name recognition helped with their entry into intraLATA toll. Forced migration of customers would

⁴³ NPRM at ¶ 38.

only cause customer confusion and impose costs for those who want to return to the original DA provider.

One possible benefit of a presubscription process may be that DA providers, whether ILECs or competitive providers, may see the need to advertise and educate the public about the respective merits of their offerings. The PA OCA would hope that in that process, consumers would evaluate their particular needs for DA service based on price, convenience -- including DA accuracy, and type of DA service.

IV. CONCLUSION

WHEREFORE, the Pennsylvania Office of Consumer Advocate respectfully submits that the Federal Communications Commission consider these Comments when analyzing its Notice of Proposed Rulemaking regarding the use of 411 to access directory assistance services. In particular, the PA OCA submits that the FCC should not change how numbers are assigned for access to DA service, except in those states or for those LECs' whose provision of DA service has been found to be competitive under relevant state law.

Respectfully submitted,

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Date: April 1, 2002
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April 1, 2002

Office of the Secretary
Federal Communications Commission
445 12th Street, S. W.
Washington, DC 20554

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The Use of N11 Codes and Other Abbreviated
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CC Docket No. 92-105
Administration of the North American Numbering
Plan
CC Docket No. 92-237

Dear Secretary:

Enclosed please find an original and four copies of the Pennsylvania Office of Consumer Advocate's Comments in the above-referenced matter. Please also note that these Comments have been filed with the Commission electronically.

Please indicate your receipt of this filing on the additional copy provided and return it to the undersigned in the enclosed self-addressed, postage prepaid, envelope. Thank you.

Sincerely yours,

Joel H. Cheskis
Assistant Consumer Advocate

Enclosure
cc: Network Services Division

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Numbering Plan	:	

I hereby certify that I have this day served a true copy of the foregoing document,
Office of Consumer Advocate's Comments, upon parties of record in this proceeding.

Dated this 1st day of April, 2002.

Respectfully submitted,

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Assistant Consumer Advocate

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